

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYNOSURE, LLC, et al.;

Plaintiffs,

v.

REVEAL LASERS LLC., et al.;

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**CYNOSURE’S RESPONSE TO FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
ORDER (DKT. 732)**

In response to the Court’s Findings of Fact, Conclusions of Law, and Order (Dkt. 732), Plaintiffs Cynosure, LLC and Lotus Parent, Inc. (collectively, “Cynosure”) will agree to (1) have the Court enter a partial final judgment under Fed. R. Civ. P. 54(b) with regard to the claims against Reveal Lasers Ltd., Reveal Lasers LLC, Robert Daley, and Christopher Chambers and (2) stay the claims against the remaining defendants pending any appeal that may follow entry of partial final judgment (and, in doing so, will agree to waive prejudgment interest from December 18, 2024 through the date of judgment against each remaining defendant).

Additionally, Cynosure requests that, pursuant to Fed. R. Civ. P. 54(b), the Court set a briefing and hearing schedule for Cynosure’s motion for attorney’s fees and costs, with Cynosure’s motion being due within 30 days after entry of partial final judgment.

August 21, 2025

Respectfully submitted,

CYNOSURE, LLC
LOTUS PARENT, INC.

By their attorneys,

/s/ Dipanwita Deb Amar

Dipanwita Deb Amar

Joseph Farris

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CERTIFICATE OF SERVICE

I, Dipanwita Amar, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on August 21, 2025. I further certify that this document was served electronically via email on Christopher Chambers, Reveal Lasers LLC, and Reveal Lasers LTD on August 21, 2025.

/s/ Dipanwita Deb Amar

Dipanwita Deb Amar